

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MARGARET CRAIG, as next of  
kin and personal  
representative of the estate  
of Angela Hulsey,

Plaintiff

vs.

CHEATHAM COUNTY, TENNESSEE,  
BEN MOORE, MARK BRYANT,  
STEPHANIE GIZZI-BELL, JESSICA  
PLANK, et al.,

Defendants

Case No. 3:17-cv-01335  
JURY DEMAND  
JUDGE CAMPBELL  
MAGISTRATE HOLMES

---

**The deposition of**

**JEFF KEY**

**December 12, 2018**

---

CHERYL H. CARTER, RPR, LCR, CCR  
Accurate Court Reporting  
P.O. Box 682683  
Franklin, TN 37068  
(615) 244-DEPO or 244-3376  
www.ACR-Nashville.com

1 MS. KELLY: Yeah.

2 THE WITNESS: Sorry. I saw one that --

3 MR. MOSELEY: We're here to get information.  
4 That's not -- we'll go off the record while she does  
5 that.

6 (Recess taken, 1:17 p.m. to 1:20.)

7 MR. MOSELEY: So we took a quick break. What  
8 we're going to do, we -- there was one page missing from  
9 Mr. Hannah's exhibit that we have been using to identify  
10 individual's initials. I'm going to go ahead and make  
11 that Exhibit 2 Exhibit 1 to Mr. Key's deposition. And  
12 then we have the second page we'll make Exhibit 2 to  
13 Mr. Key's deposition.

14 And I'll just note that Exhibit 1 has all of  
15 the prior witnesses' notations and marks related to  
16 their entries that they had.

17 (Observation Cell Record marked Exhibit 1;  
18 Medical Watch Inmate Activity Log marked Exhibit 2 to  
19 this deposition.)

20 Q. (By Mr. Moseley) Mr. Key, you had, I think,  
21 one entry in this exhibit for October 11<sup>th</sup>.

22 A. Yes, sir.

23 Q. Tell me the significance of that.

24 A. On October 11<sup>th</sup>, at 2150 hours I made my  
25 first observation of her in her cell which was 1 and 3,

1           A.    Yeah. Well, she was either at the counter or  
2 still sitting in the chair that they were checking her  
3 stats at.

4           Q.    You mentioned that she wasn't feeling well.  
5                   What to your recollection were her symptoms,  
6 or what observations did you make of her not feeling  
7 well?

8           A.    She was sweating. She -- she didn't appear to  
9 feel well as far as like her -- she looked like she just  
10 didn't feel well. And I guess to explain that, like,  
11 she was kind of slumped a little and was just --  
12 appeared to feel weak, if you will.

13          Q.    All right. There was one notation -- and I'm  
14 not attributing it to you, but I saw -- it maybe in  
15 relation to this same timeframe -- that she may have  
16 been panicking?

17          A.    I don't recall her panicking.

18          Q.    Do you recall anything about her breathing at  
19 that time?

20          A.    I don't, sir.

21          Q.    Do you recall what her vital signs were?

22          A.    No, sir, I don't. I do know that -- or I do  
23 remember -- I don't know exactly what they were, but  
24 they were within normal realm at that point once he  
25 called the nurse as I recall. And I say "normal realm."